United Nations DP/2017/5

Executive Board of the United Nations Development Programme, the United Nations Population Fund and the United Nations Office for Project Services

Distr.: General
23 November 2016

Original: English

First regular session 2017
30 January - 3 February 2017, New York
Item 3 of the provisional agenda
Evaluation

Management response to the evaluation of UNDP contribution to anti-corruption and addressing drivers of corruption

Context and background

1. UNDP recognizes that this evaluation was conducted at an opportune moment, as major events and developments are shaping the discourse on the importance of anti-corruption efforts in accelerating development progress and in implementing the 2030 Agenda for Sustainable Development. There is increasing evidence that addressing corruption promotes transparency and accountability in decision-making processes, and enhances development outcomes. While corruption is a difficult phenomenon to measure due to its complexity, correlations between corruption indicators and economic and human development indicators have become more evident in contextual analyses of the underlying drivers of stability and development. Countries scoring low on corruption prevalence or perceptions tend to be countries that enjoy greater prosperity, opportunity, and individual liberty.

2. The 2030 Agenda emphasizes the need to fight corruption and illicit financial flows to build peaceful, just and inclusive societies. Fighting corruption and other targets under goal 16 is considered equally important for the achievement of the other sustainable development goals. Moreover, the global demand for greater transparency and accountability is increasing, with 180 state parties ratifying or acceding to the United Nations Convention Against Corruption.[1]

3. UNDP contributions to global anti-corruption efforts have been significant and distinct, focused on building national anti-corruption capacities, strengthening relevant institutions and promoting corruption risk assessments in selected sectors. During the period 2010-2015, anti-corruption was one of the fastest-growing policy service areas in UNDP.

4. The evaluation assessed the contribution of UNDP to: (a) strengthening national capacities in anti-corruption and addressing drivers of corruption in different development

[1] As of 6 October 2016. See, https://www.unodc.org/unodc/en/treaties/CAC/

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contexts; and (b) global and regional anti-corruption policy debates and advocacy. It also identified factors that explain UNDP contributions. The evaluation covers the period 2008-2016, and presents key findings, conclusions, and recommendations that will inform future management decisions and priority-setting for UNDP strategic engagement.

Findings and conclusions

5. UNDP management welcomes the acknowledgement that, with the overarching goal of achieving development outcomes such as the Millennium Development Goals and the sustainable development goals, UNDP has given high priority to anti-corruption work across UNDP country programmes.

6. UNDP management acknowledges the findings indicating that UNDP is a key actor in providing democratic governance assistance, plays an important role in assisting developing countries to strengthen public policies and institutional systems, and proactively engages in debates, advocacy, knowledge management and partnerships on anti-corruption at the global and regional levels – including its contribution to the integration of anti-corruption, accountability and transparency targets of sustainable development goal 16. In several countries, UNDP was one of the first organizations to support governments in strengthening governance and building national capacities and institutions in which fighting corruption and enhancing transparency are critical objectives. UNDP has been responsive to evolving national governance issues in complex and fragile development contexts.

7. UNDP welcomes the acknowledgement that our programme support is based on the principle that ownership and responsibility for development outcomes rest with national authorities. UNDP programmes align with national priorities and promote national ownership as part of our commitment to the principles of the Global Partnership for Effective Development Cooperation. The UNDP focus on accountability, transparency and other integrity aspects of governance aims to address issues of corruption more systematically, by (a) preventing corruption in public management and service delivery, so as to increase development effectiveness, and (b) engaging with all major stakeholders (governments, parliaments, civil society and the private sector).

8. UNDP management appreciates the findings of the evaluation highlighting that the organization has complemented the normative role of the United Nations Office of Drugs and Crime (UNODC) in the United Nations Convention Against Corruption, facilitating initiatives to further compliance with and implementation of the Convention. This is a central initiative of UNDP in 'delivering as one' and strengthening the coherence and convergence of development interventions.

9. We welcome the finding that UNDP has made strong contributions to local-level transparency and accountability measures through its participatory local governance and local development initiatives. UNDP supported the efforts of civil society organizations to take forward anti-corruption and transparency advocacy, and achieved its stated objectives in several areas of governance integrity support, including local-level access to public information. UNDP particularly promoted initiatives that facilitate citizens' and communities' access to and utilization of information through information and communication technologies to engage in local planning and decision-making.

10. We also welcome the finding that UNDP institutional programme frameworks recognize anti-corruption as key to accelerating sustainable development outcomes. UNDP responded to a range of anti-corruption policy and capacity needs in all of the 65 countries included in this evaluation.

11. UNDP appreciates the finding that the anti-corruption projects were largely mobilized by country offices (underscoring the importance of local ownership), with UNDP global and regional programmes providing technical and programme management support and seed funding to initiate new projects. The evaluation noted the reduction in the scale of anti-corruption programmes and country coverage since 2011, acknowledging that this corresponded to a similar decrease in overall governance expenditure and decline in UNDP core funding. The reduction of expenditures in stand-alone anti-corruption projects was partly due to the fact that, in recent years, UNDP anti-corruption projects at the county level have been part of larger governance initiatives and programmes. However, at project levels, UNDP Integrated Results and Resources Framework performance data clearly show that, in 2015, overall UNDP expenditure on anti-corruption was $40 million, a 19 per cent increase from 2014. Anti-corruption is, in fact, the only output in outcome 2 where UNDP expenditure increased in 2015, which indicates a growing interest in its anti-corruption work, with the Africa region accounting for nearly half of the expenditure.

12. UNDP notes the reduction in resources directed to governance and anti-corruption in recent years. This is partly a reflection of a constrained global aid environment that increasingly prioritizes resources for short-term, urgent humanitarian, security and migration issues. This has been one of the underlying causes of the reduction in core resources in UNDP in recent years. The cuts to core have directly affected those programmatic areas that partners want UNDP to prioritize and invest in – such as the work on anti-corruption, an essential target under goal 16, which is linked to most of the other sustainable development goals. However, pursuant to UNDP structural reform under the strategic plan, 2014-2017, and the consolidation of the governance and peacebuilding portfolios (previously in two different bureaus), the overall percentage of UNDP expenditure on governance rose to approximately 47 per cent of combined programme expenditure in 2014, and 48 per cent in 2015 (compared to 37 per cent in 2008 and 2009).

13. Management welcomes the findings that recognize UNDP contributions to national anti-corruption priorities. Through its support to anti-corruption policies and practices UNDP informed, and in many instances shaped, government programmes and priorities. There were improvements in the anti-corruption policies of about two-thirds of the countries assessed. Since progress in anti-corruption and addressing the drivers of corruption is a complex phenomenon, we also note as positive the overall performance rating of relevant UNDP initiatives of 3.55 on a 5-point scale. That is a moderate-to-good score, with high rankings on the relevance and effectiveness of the various initiatives undertaken; timeliness and responsiveness to developing legislation; and building the capacities of anti-corruption institutions.

14. UNDP management takes note of the significant finding that anti-corruption legislation and institutions are not, by themselves, sufficient to control corruption unless combined with robust judicial prosecution and enforcement systems and measures to ensure government accountability. We acknowledge the need to link anti-corruption efforts with governance measures such as public procurement, public finance management, judicial and prosecution services, public sector management, and public reporting.

15. We agree with the conclusion that the overall impact, particularly in implementing comprehensive programmes that link with the central components of governance reforms, depends on resources, political will, effective coordination among government agencies, sustainability, and many other factors. The report emphatically states that anti-corruption gains will remain limited if they are not combined with a wider set of initiatives aimed at improving the quality of governance institutions and processes overall. In the UNDP approach, anti-corruption is an essential cross-cutting component of governance and peace-building work. Addressing the drivers of corruption (by fostering effective democratic governance) is part of the strategy to prevent corruption (UNDP anti-corruption practice note, 2008).

16. UNDP takes note of the findings indicating that when support was provided to anti-corruption enforcement agencies in isolation of the overall institutional environment, outcomes were limited. We acknowledge that effective functioning of one anti-corruption agency depended on collaboration and cooperation with other enforcement agencies and institutions. This is one of the important lessons learned by UNDP in providing technical support to the oversight institutions. Nonetheless, given their role in coordinating and monitoring national anti-corruption plans and strategies, support to anti-corruption agencies has been an important programming entry point for UNDP, in many cases taking the lead in implementing the United Nations Convention Against Corruption.

17. UNDP agrees with the conclusion that, although it provided anti-corruption programme support in complex political contexts with multiple development and public administration challenges, the organization contributed to strengthening national anti-corruption capacities, in many instances shaping government policies and priorities and strengthening institutions. Many countries where UNDP provides support continue to face systemic challenges in their efforts to improve accountability and reduce corruption. Government commitment, a conducive political environment, sustained engagement, and adequate resources are important conditions for pursuing anti-corruption policies and institutional measures.

18. UNDP also agrees with the conclusion that anti-corruption efforts and addressing the drivers of corruption were key areas of UNDP support during the current and previous strategic plans, and are integral to the UNDP commitment to the 2030 Sustainable Development Agenda. Although the resources spent are not comparable to those spent by some of the international financial institutions, UNDP has developed a unique niche in supporting efforts to address corruption drivers and strengthen national anti-corruption capacities.

19. UNDP takes note of the conclusion that there were tangible outcomes when UNDP addressed anti-corruption and drivers of corruption issues as part of local development and local governance. Building on this, UNDP will focus on sustaining those efforts to generate further demand for transparent, accountable service delivery – including justice and security – at the local level. UNDP appreciates the conclusion that its advocacy and inputs into global and regional debates promoted stronger links between anti-corruption and other development communities. Similarly, UNDP corruption risk assessments and accountability initiatives were more effective when a sectoral approach was taken.

20. UNDP management believes that some of the findings and the conclusions of the evaluation should be contextualized appropriately, be evidence-based, and be supported by more detailed analysis. For example, conclusion 6 states that UNDP has not taken full advantage of its opportunities to better integrate sectoral approaches into its other development programming. Over the years, UNDP has made a great effort to ensure stronger integration of anti-corruption in service delivery (such as in the education, health, and water sectors), and building synergies with other areas of its work (such as with the United Nations Collaborative Programme on Reducing Emissions from Deforestation and Forest Degradation in Developing Countries, the extractive initiative (in Kosovo[2], for example), gender empowerment initiatives, and the Global Fund to Fight AIDS, Tuberculosis and Malaria (in Nigeria and Ukraine, for example).

21. Notably, the Integrated Results and Resources Framework of the strategic plan, measuring UNDP development performance, includes a discrete output titled 'Institutions and systems enabled to address awareness, prevention and enforcement of anticorruption measures across sectors and stakeholders' under which 57 country offices across regions

[2] United Nations-administered Territory of Kosovo (Security Council resolution 1244)

reported work and results, mainly relating to measures adopted to mitigate sector-specific corruption risks. UNDP support to the 2030 Sustainable Development Agenda through the implementation of the 'mainstreaming, acceleration and policy support' approach, and its coordinating role in promoting "integration of anti-corruption in United Nations programming processes such as the United Nations Development Assistance Framework", have gained momentum and are promoting further integration of the sectoral anti-corruption approach into other development programming (notably in the area of justice, security, procurement, and construction).

22. The evaluation points out that public administration support is under-emphasized at the UNDP institutional level. Public administration is a vast area of work, with many development partners involved. The UNDP strategic plan, 2014-2017, has prioritized UNDP support to focus on core governance functions (i.e. the restoration of core public administration functionality) in fragile and conflict affected settings, as well as on the integrity, transparency and accountability of public institutions. Public administration is a key entry point in nearly all UNDP work, whether related to the environment, energy, disaster risk management or recovery efforts. Even in sectors that fall under the mandate of other United Nations entities (health, education, or water and sanitation, for example), UNDP carries out corruption risk assessments using the public administration as the main entry point.

Annex. Key evaluation recommendations and UNDP management response

Recommendation 1. **Prioritize support to addressing corruption risks to development. Develop an anti-corruption programme strategy that more explicitly links the UNDP anti-corruption approach to other development programming.**

Management response: UNDP management agrees that the organization should prioritize support to addressing corruption risks to development. UNDP management will ensure that this is taken into full consideration in developing the draft of the next strategic plan, 2018-2021. The UNDP programme on anti-corruption for development was the first to link anti-corruption with development. Learning from the implementation of the Millennium Development Goals (MDG) acceleration framework in many countries, UNDP is identifying governance and corruption-related bottlenecks in service delivery. UNDP global, regional and country-level governance and anti-corruption programmes are implementing projects that seek to identify corruption risk assessments in the health, education and water sectors in order to contribute to national development outcomes. With the Seoul Policy Centre we have expanded these risk assessments to the construction sector, and we plan to expand them to the justice and security sectors.

In supporting the sustainable development goals (SDGs), UNDP aims to apply the 'mainstreaming, acceleration and policy support' approach (known as 'MAPS'), which is the common strategy approved by the United Nations Development Group (UNDG) to ensure effective, coherent implementation of the SDG agenda. This should ensure that various targets under goal 16 are integrated into national plans, strategies and budgets, including through a sectoral approach, social accountability initiatives, and the mainstreaming of the United Nations Convention Against Corruption into the development processes. Acceleration will be supported by the use and further elaboration of tools and methodologies (including risk assessment tools) to identify critical constraints and governance or other bottlenecks (including in anti-corruption). UNDP will provide coordinated policy support to countries that will be involved in project implementation, through UNDP global and regional advisers in coordination with UNODC and other partners, particularly in the implementation and mainstreaming of goal 16 and its targets. UNDP is prioritizing 'clean construction' and 'e-procurement' as an anti-corruption contribution to other goals, such as goal 9 on infrastructure. UNDP has started developing and rolling out a support package to integrate anti-corruption in the Global Fund to Fight AIDS, Tuberculosis and Malaria (in Ukraine and Nigeria, for example).

As Chair of the UNDG and coordinator of the United Nations resident coordinator system, UNDP is coordinating with nine other United Nations organizations to provide training to field staff on integrating anti-corruption into United Nations programming processes such as the United Nations Development Assistance Framework (UNDAF). UNDP, with other United Nations partners, aims to integrate anti-corruption into national plans and development processes, including those related to the SDGs through UNDAFs and other country-level United Nations programmes and projects.

Key action(s)	Time frame	Responsible unit(s)	Tracking[3]	
			Status	Comments
1.1 Ensure that prioritization of support to addressing corruption risks to development is taken into full consideration in the process of developing the draft of the UNDP strategic plan, 2018-2021.	By end December 2016	Bureau for Policy and Programme Support (BPPS), Executive Office		
1.2 Make sure anti-corruption is a part of the MAPS approach and other support packages developed to support the SDG agenda.	By March 2017	BPPS		

[3] Implementation status is tracked in the Evaluation Resource Centre

Recommendation 2. **Address regional variations in anti-corruption support and prioritize support to regions that are currently underrepresented.**				
Management response: UNDP management agrees with the recommendation that UNDP should address regional variations in anti-corruption support in a development context. UNDP will analyse these variations and prepare recommendations for relevant actions to be taken to address them in its regional and country level anti-corruption programming. Full coverage of all regions will depend on the availability of sufficient financial resources.				
2.1. In collaboration with the regional bureaus and hubs, prepare analysis of the regional variations in anti-corruption support in a development context, and recommendations to address those variations.	By December 2017	BPPS, in cooperation with regional hubs and regional bureaus		
2.2. Provide capacity-building and advisory support to country offices in regions that are underrepresented in the area of anti-corruption support.	Continuous (by end 2018)	BPPS, in cooperation with respective regional hubs and regional bureau		
2.3. Mobilize resources from development partners to secure additional policy and programme support for the regions where there is high demand for anti-corruption programming but limited resources.	By December 2017	BPPS, in cooperation with respective regional hubs and regional bureau		
Recommendation 3. **Consider prioritizing support to anti-corruption and governance risk assessments and measurement.**				
Management response: UNDP management agrees with the recommendation that UNDP should support anti-corruption and governance diagnostics and measurement. UNDP acknowledge that there have been many diagnostics, surveys, assessments and other measurements by various partners and academia. The challenge is to ensure coordination among partners, acceptance of such assessments and the data behind them by national policymakers, and their proper use for policy reform. UNDP experience has shown that most anti-corruption and governance diagnostics and measurement do not translate into policy, for reasons that include lack of political commitment, limited resources for follow-up, and lack of sustainability plans. To strengthen anti-corruption measurement and provide guidance on the use of the right indicators for measuring and monitoring corruption, UNDP published a *User's Guide to Measuring Corruption and Anti-corruption* in 2015. To strengthen efforts to support anti-corruption and governance integrity diagnostics and measurement, UNDP will: (a) Coordinate with other partners to standardize the corruption measurement methodologies to support the more effective use of anti-corruption and governance diagnostics and measurement; (b) Ensure sustainability of projects from integrity assessment to policy reforms by securing buy in from the governments and bringing together various stakeholders from the onset of the project implementation; and (c) Maximize the use of information and communication technology (ICT) and social media to strengthen feedback mechanisms and solve the governance corruption-related bottlenecks in the service delivery. UNDP will seek government cost sharing to make sure that the ICT pilots are scaled up and sustained.				
2.1. Within the context of UNDP work on the SDG indicators (particularly for goal 16). Review and update UNDP tools and instruments supporting anti-corruption and governance diagnostics and measurement.	By December 2017	BPPS (Oslo Governance Centre – OGC – in particular), in cooperation with regional hubs, regional bureaus and country offices and other relevant partners (such as UNODC and the Praia City Group)		
2.2. Provide capacity-building and advisory support to country offices in relation to anti-	Continuous	BPPS (OGC in particular), in		

corruption and governance integrity diagnostics and measurement.	(by end 2018)	cooperation with regional hubs and regional bureaus		
Recommendation 4. **Increase support for local-level initiatives to strengthen demand-side accountability, particularly concerning access to information and social accountability initiatives.**				
Management response: UNDP management fully agrees with the recommendation. During the last eight years, UNDP contributed to anti-corruption and addressed drivers of corruption by strengthening its engagement with youth, women's groups, communities, and many local-level civil society actors and non-government organizations, to raise the demand side of accountability. UNDP will continue its engagement with various civil society actors such as the Transparency International, Integrity Action and the Huairou Commission (the international organization of grassroots women's networks) at the global level, while continuing its engagement with national and local-level civil society organizations (CSOs), youth and women's group, communities, and non-governmental organizations to strengthen service delivery, budgets and infrastructures, and the monitoring of corruption. UNDP will include government and non-governmental actors to make sure that there is a two-way dialogue contributing to an effective feedback mechanism that produces tangible results from the increase in demand-side accountability. One of the main objectives of UNDP initiatives will be to strengthen social accountability in the health, education, water, infrastructure, justice and security and other relevant sectors to contribute to attainment of the SDGs. Measures will include: (a) Continue UNDP partnership with Transparency International and other global partners to raise the global demand for social accountability; (b) At the national and local level, work with civil society actors and the private sector to promote and scale up successful initiatives on open data, access to information, and procurement transparency in service delivery at the local level; (c) Continue to support the monitoring of budgets, expenditure and services by civil society and the community, including through the adoption of new technologies to monitor services; (d) Strengthen women's networks to improve transparency and accountability in service delivery by scaling up successful local and national-level initiatives; and (e) Provide support to youth networks for their innovative social accountability projects.				
4.1. Provide capacity-building and advisory support to country offices on how the country-level projects could enhance their engagement in social accountability, including monitoring and oversight related to the SDGs.	By December 2018	BPPS and regional hubs		
4.2. Provide capacity-building support to national and local-level youth and women's groups, CSOs and community organizations on how they could work together with government authorities to monitor services, budgets and infrastructures.	By December 2018	BPPS and regional hubs		
4.3. Continue UNDP engagement in knowledge, advocacy and partnership to integrate anti-corruption into local development and urban governance agenda, including through work on open data, open budgeting and open contracting as part of the 'smart cities' initiative.	Continuous (by end 2018)	BPPS and regional hubs (with relevant partners) Regional Bureau for Eastern Europe (on open data in particular)		
Recommendation 5. **Further strengthen global and regional anti-corruption projects to support country programmes as well as to enable UNDP to contribute to regional and global policy debates and advocacy. Global and regional projects should be used to develop key streams of programme support at the country level.**				
Management response: UNDP management fully agrees with the recommendation. UNDP will consider opportunities for strengthening anti-corruption components in existing global and regional governance programmes and initiatives. In line with this recommendation, UNDP has rolled out the 'Anti-corruption for Peaceful and Inclusive Societies' global project (known as 'ACPIS') to continue UNDP global policy and programme support on anti-corruption. The new UNDP funding windows (such as the window on governance for peaceful and inclusive societies) will be used as an opportunity for UNDP to allocate funding to global,				

regional and country-level anti-corruption initiatives.				
5.1. Integrate global and regional anti-corruption targets in the results and resources frameworks of the UNDP's new strategic plan, global and regional programmes.	By December 2017	BPPS, in cooperation with regional hubs and regional bureaus		
5.2. Continue mobilizing more resources for UNDP global and regional anti-corruption initiatives and working together with other relevant partners for joint global and regional activities on anti-corruption.	Continuous (by end 2018)	BPPS, the Bureau for External Relations and Advocacy (BERA) and regional hubs (with partners)		
Recommendation 6. **Enhance fund mobilization for anti-corruption support, championing select areas of anti-corruption and accountability initiatives.**				
Management response: UNDP management fully agrees with the recommendation, while noting the challenges resulting from the high degree of dependence on a handful of donors to its global anti-corruption programme. UNDP will intensify its partnership development efforts and diversify the donor base when mobilizing resources for supporting anti-corruption and governance interventions, focusing particularly on multilateral development banks, the private sector, and donor agencies. The roll-out of the ACPIS global project, 2016-2020, is an opportunity for donor partners to contribute specifically to UNDP anti-corruption work. The new UNDP funding windows (such as the window on governance for peaceful and inclusive societies) also provide an opportunity for interested donor partners to provide pooled, flexible funding through which they can support implementation of the UNDP strategic plan. The objective of the funding windows is to improve the quality of non-core funding to UNDP, promote more integrated programming, and respond to emerging issues. The windows are intended to help UNDP and its partners align around common goals to support country-focused efforts to achieve the SDGs. UNDP will: (a) Work with UNODC and other United Nations partners to design joint programmes/projects on anti-corruption and governance integrity; (b) Continue to brief donor partners on UNDP plans to implement goal 16 and mainstream it into other goals (this will help to mobilize additional resources in support of the SDGs); and (c) Brief donor partners on the UNDP approach, niche and priorities regarding anti-corruption and its global, regional and country-level projects and activities.				
6.1. Develop resource mobilization and partnership strategy, emphasizing the importance of anti-corruption and addressing the drivers of corruption in the context of implementing, measuring and monitoring the SDGs.	By December 2017	BPPS, in cooperation with BERA and regional hubs, regional bureaus and country offices		
6.2. Showcase innovative responses to corruption, including tools for openness, use of open data and technologies that are of particular interest to some donors and partners	By December 2017	BPPS, in cooperation with BERA and regional hubs, regional bureaus and country offices		
Recommendation 7. **Strengthen staff capacities at the global and regional level to specifically address the need for more specialized policy and technical services for anti-corruption programming.**				
Management response: UNDP management fully agrees with the recommendation, while recognizing that an expansion of capacities is dependent on additional resources. UNDP will ensure that relevant capacities in support of development and implementation of anti-corruption programming are maintained and strengthened to the extent possible and pending the mobilization of additional resources.				
7.1. Ensure that designated capacities for anti-corruption programming are in place in country offices, regional service centres and headquarters to advise and support other practices to design, monitor, implement and evaluate anti-corruption programmes	By December 2017	BPPS, in cooperation with respective regional hubs, regional bureaus and country offices		